

1 **HAGENS BERMAN SOBOL SHAPIRO LLP**
2 Shana E. Scarlett (Bar No. 217895)
shanas@hbsslaw.com
3 715 Hearst Avenue, Suite 300
Berkeley, CA 94710
4 Telephone: (510) 725-3000

1 **QUINN EMANUEL URQUHART & SULLIVAN, LLP**
2 Kevin Y. Teruya (Bar No. 235916)
kevinteruya@quinnemanuel.com
3 865 South Figueroa Street, 10th Floor
Los Angeles, CA 90017
4 Telephone: (213) 443-3000

5 *Interim Co-Lead Consumer Class Counsel*

6 [Additional counsel listed on signature page]

7
8 **UNITED STATES DISTRICT COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA**
10 **SAN FRANCISCO DIVISION**

11 MAXIMILIAN KLEIN, et al.,

Consolidated Case No. 3:20-cv-08570-JD

12 Plaintiffs,

**CONSUMER PLAINTIFFS' INTERIM
ADMINISTRATIVE MOTION TO
PROVISIONALLY FILE UNDER SEAL
CONSUMER PLAINTIFFS' REPLY IN
SUPPORT OF RENEWED MOTION FOR
CLASS CERTIFICATION AND
APPOINTMENT OF CLASS COUNSEL
AND SUPPORTING MATERIALS**

13 vs.

14 META PLATFORMS, INC.,

15 Defendant.

16
17 This Document Relates To: All Actions
The Hon. James Donato

18
19 Hearing Date: September 26, 2024
20 Hearing Time: 10:00 a.m.

21
22
23
24
25
26
27
28

1 Pursuant to the Court's September 20, 2023 and March 25, 2024 Orders granting the parties'
2 stipulation to modify the sealing procedures applicable to class certification, *Daubert*, and other
3 briefing, Dkt. Nos. 656 & 745, Consumer Plaintiffs submit this interim administrative motion to
4 provisionally file under seal the unredacted versions of Consumer Plaintiffs' Reply In Support of
5 Renewed Motion for Class Certification and Appointment of Class Counsel, certain exhibits
6 submitted as attachments to the declaration of Kevin Y. Teruya in support thereof, and the Abridged
7 Rebuttal Expert Declaration of Nicholas Economides, Ph.D. in Support of Renewed Motion to Certify
8 Consumer Class.

9 Consistent with the Court's September 20, 2023 and March 25, 2024 Orders, Consumer
10 Plaintiffs will coordinate with Facebook and non-parties to file an omnibus sealing motion. In the
11 interim, Consumers respectfully request that the Court provisionally maintain under seal the requested
12 materials.

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

1 DATED: July 8, 2024

2 By: /s/ Shana E. Scarlett

3 **HAGENS BERMAN SOBOL SHAPIRO LLP**
Shana E. Scarlett (Bar No. 217895)
shanas@hbsslaw.com
715 Hearst Avenue, Suite 202
Berkeley, CA 94710
(510) 725-3000

6 Steve W. Berman (admitted *pro hac vice*)
steve@hbsslaw.com
7 1301 Second Avenue, Suite 2000
Seattle, WA 98101
(206) 623-7292

9 *Interim Co-Lead Consumer Class Counsel*

10 **LOCKRIDGE GRINDAL NAUEN P.L.L.P.**

11 W. Joseph Bruckner (admitted *pro hac*

vice)

12 wjbruckner@locklaw.com

13 Robert K. Shelquist (admitted *pro hac*
vice)

rkshelquist@locklaw.com

14 Brian D. Clark (admitted *pro hac vice*)

bdclark@locklaw.com

15 Rebecca A. Peterson (Bar No. 241858)

rapeterson@locklaw.com

16 Kyle Pozan (admitted *pro hac vice*)

kjpozan@locklaw.com

17 Laura M. Matson (admitted *pro hac vice*)

lmmatson@locklaw.com

18 100 Washington Avenue South, Suite
2200

19 Minneapolis, MN 55401

(612) 339-6900

20 *Interim Counsel for the Consumer Class*

21 By: /s/ Kevin Y. Teruya

22 **QUINN EMANUEL URQUHART & SULLIVAN,
LLP**

23 Kevin Y. Teruya (Bar No. 235916)

24 kevinteruya@quinnmanuel.com

25 Adam B. Wolfson (Bar No. 262125)

26 adamwolfson@quinnmanuel.com

27 Scott L. Watson (Bar No. 219147)

28 scottwatson@quinnmanuel.com

Claire D. Hausman (Bar No. 282091)

clairehausman@quinnmanuel.com

Brantley I. Pepperman (Bar No. 322057)

brantleypepperman@quinnmanuel.com

865 South Figueroa Street, 10th Floor

Los Angeles, CA 90017-2543

(213) 443-3000

Michelle Schmit (admitted *pro hac vice*)

michelleschmit@quinnmanuel.com

191 N. Wacker Drive, Suite 2700

Chicago, IL 60606-1881

(312) 705-7400

Manisha M. Sheth (admitted *pro hac vice*)

manishasheth@quinnmanuel.com

51 Madison Avenue, 22nd Floor

New York, New York 10010

(212) 849-7000

Interim Co-Lead Consumer Class Counsel

ATTESTATION OF KEVIN Y. TERUYA

2 This document is being filed through the Electronic Case Filing (ECF) system by attorney
3 Kevin Y. Teruya. By his signature, Mr. Teruya attests that he has obtained concurrence in the filing
4 of this document from each of the attorneys identified on the caption page and in the above signature
5 block.

Dated: July 8, 2024

By /s/ Kevin Y. Teruya
Kevin Y. Teruya

CERTIFICATE OF SERVICE

10 I hereby certify that on this 8th day of July 2024, I electronically transmitted the foregoing
11 document to the Clerk's Office using the CM/ECF System, causing it to be electronically served on
12 all attorneys of record.

By /s/ Kevin Y. Teruya
Kevin Y. Teruya